

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

FCS ADVISORS, LLC,

Plaintiff,

-against-

THEIA GROUP, INC., d/b/a “THORIAN  
GROUP” and/or “CYPHERIAN”; THEIA  
AVIATION, LLC; and THEIA HOLDINGS A,  
INC., d/b/a “THORIAN HOLDINGS,”

Defendants.

21 Civ. 6995 (PKC)

**DECLARATION OF RODNEY ALLISON**  
**IN SUPPORT OF COGNISPHERE LLC’S MOTION TO COMPEL**  
**BASLER TURBO CONVERSIONS, L.L.C. TO COMPLY WITH COURT ORDER**

I, Rodney Allison, hereby declare as follows:

1. I submit this declaration in support of CogniSphere, LLC’s (“CogniSphere”) reply in further support of its motion to compel Basler Turbo Conversions, L.L.C. (“Basler”) to comply with the Court’s June 11, 2024 order.

2. Except as otherwise noted, I have personal knowledge of the matters set forth herein, and, if called upon, could and would competently testify thereto under oath.

3. I am President and Chief Executive Officer of XP Services, an aircraft maintenance company that provides services ranging from flight testing and flight training to avionics modernization for a wide range of government and commercial clients.

4. I am a graduate of the U.S. Naval Test Pilot School with over twenty years of U.S. Army Special Operations aviation experience. I maintain over 20 FAA type certificates in both

rotary and fixed wing aircraft, have 14,000+ flight hours, and I am qualified in over 140 different aircraft.

5. I also hold current Airline Transport Pilot, Flight Engineer, and Certified Flight Instructor Certification, am a FAA Designated Engineering Representative, and am an associate fellow of The Society of Experimental Test Pilots. I have also held a U.S. Department of Defense (DoD) Top Secret–Special Compartmented Information (TS-SCI) clearance and currently hold a DoD Secret clearance.

6. I earned a Bachelor of Science, Professional Aeronautics from Embry-Riddle Aeronautical University and a Master of Science from the University of Tennessee Space Institute. I am a former research professor at the University of Tennessee Space Institute.

7. Based on my decades of experience in the aviation industry, my understanding is that the phrase “FAA Airworthiness Certificate” customarily means a standard category FAA Airworthiness Certificate.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: November 18, 2024  
Tullahoma, Tennessee

/s/ Rodney Allison  
Rodney Allison